

Inspection Date	11/30/04
Time Start	
Time Finish	

HAZARDOUS WASTE INSPECTION REPORT ⊠ GENERATOR ☐ S Q GENERATOR

Со	mpany name <u>Alex C. Fergusson, Inc. (AFCO)</u> I.D. Number <u>PAD002268456</u>
Sit	e Address <u>25 Spring Mill Drive, Frazer PA</u>
Со	unty Chester Municipality Charlestown Township Zip 19355
Na	me of Inspector Melissa Menkevich
Na	me & Title of Responsible Official <u>Dave Zmijewski - Chemist</u>
Pe	rson Interviewed same as above Telephone (610) 647-3300
Ма	iling Address (if different from above)
Αm	nount of Hazardous Waste Generated per Month: > 2200 Pounds Kgs
1.	Site Characterization:
	STORAGE: Container Tanks Containment Bldg. Drip Pad Other
	PBR: Neutralization/WWTP Reclaim Other
	GENERATOR TREATMENT
2.	Universal Waste:
	Universal Waste Types
3.	Hazardous Waste Transporters:
	Transporter Name Horwith Trucks, Inc. License Number PA-AH 0176
	Transporter Name SJ Transportation License Number NJD071629976
	Transporter Name License Number
4.	Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D002	Waste Corrosive Liquid, basic, inorganic (contains sodium hydroxide and potassium hydroxide)	Michigan Disposal Waste Treatment Plant, MID0000724831
D001	Corrosive solids (contains sodium percarbonate and sodium perborate tetrahydrate)	Michigan Disposal
D002	RQ waste corrosive liquids (hyrdrofluoric, sulfuric, phosphoric, nitric)	Michigan Disposal
D002	Waste corrosive liquid, basic, inorganic (contains potassium hydroxide)	El DuPont de Nemours, Co. (NJD002385730)
D001, F003	Waste flammable liquids (contains acetone and xylene)	EQ Resource Recovery (MID060975844)

Page ____ of __')

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Alex C. Fergusson, Inc. (AFCO) ID Number PAD002268456 Date 11/30/04

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
\boxtimes				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
\boxtimes				Identification Number	262a.10	262.12	H002
\boxtimes				Authorized transporters only	262a.10	262.12(c)	H003
\boxtimes				Subsequent notification requirements met	262a.12(b)		H004
\boxtimes				Proper manifest used	262a.10	262.21	H005
\boxtimes				Manifests filled out correctly and completely	262a.20		H006
\boxtimes				Manifests signed and routed properly	262a.23(a)	262.23	H007
\boxtimes				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	\boxtimes			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	\boxtimes			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
\boxtimes				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
\boxtimes				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
\boxtimes				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
\boxtimes				Specified records retained for three years	262a.10	262.40(c)	H014
\boxtimes				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
\boxtimes				Exception reporting procedures followed	262a.42	262.42	H016
\boxtimes				Spill reporting procedures followed	262a.10	262.34(d)	H017
\boxtimes				PPC plan developed and implemented	262a.10	262.34(a)	H018
	\boxtimes			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
\boxtimes				Source reduction strategy prepared and available (LQG only)	262a.100		H020
\boxtimes				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site	Nan	ne <u>Al</u>	<u>ex C.</u>	Fergusson, Inc. (AFCO) ID Number PAD002268456	Date <u>11/3</u>	0/04	-		
		1	- No	Violation Observed 2 - Not Applicable 3 - Not Determined	4 - Non Com	npliance			
STA	TUS 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.		
				CONTAINERS (Subchapter I)					
\boxtimes				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I					
\boxtimes				Containers of hazardous waste in good condition	265a.1	265.171	H026		
\boxtimes				Containers and stored waste compatible	265a.1	265.172	H027		
\boxtimes				Containers kept closed except during addition or removal 265a.1 265.173(a) of wastes					
\boxtimes				Containers managed to prevent leaks	265a.1	265.173(b)	H029		
\boxtimes				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment 265a.173					
		\boxtimes		Container storage areas inspected at least weekly	265a.1	265.174	H031		
\boxtimes				Special requirements for ignitable or reactive and incompatible waste complied with					
\boxtimes				Proper containment and collection systems in place 265a.179			H033		
\boxtimes				Air emission standards complied with (AA, BB, CC) 265a.1 265.178		265.178	H034		
\boxtimes				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035		
		\boxtimes		Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036		
\boxtimes				Containers labeled accurately identify contents	SWMA 6018.403(b)		H037		

2540-FM-LRWM0125 Rev. 9/2001



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection ID	
Field Code	

INSPECTION REPORT – RESIDUAL WASTE DISPOSAL / PROCESSING FACILITIES - PERMIT BY RULE

Sit	ite I.D.: PAD002268456			02268456 Telephone #: 610	-647-3300				
	Site Name: AFCO				Operator Name:				
Ad	Address: 25 Spring Mill Drive, Frazer, PA 19355			ring Mill Drive, Frazer, PA 19355 Address:					
Μι	ınici	pality	r: Ch	narlestown Township County: Chester	· · · · · · · · · · · · · · · · · · ·				
				icial: Mr. Dave Zmijewski Title: Chemist					
Pe	Person Interviewed:		rviev	ved:Title:			*****		
Ins	pec	tor:]	Melis	sa Menkevich Title: Waste Mana	agement Spe	cialist			
eF.	4CT	SID	#:	PF					
Ins	pec	tion (Date						
Da	ys/V	Veek	Оре	erated: 24/7					
1.	-	Гуре	of P	rocess: pH adjustment (neutralization)					
2.	-			Residual Waste Processed: approximately 200,000 gallons/month Residual Waste Processed: Dilute acid and alkaline wastewater from	plant floor an	d equipment was	hings		
			1 -	No Violation Observed 2 - Not-Applicable 3 - Not-Determined	4 - Non-C	ompliance	*		
1	ST/	ATUS 3	4	REQUIREMENT	COMMENTS ATTACHED	CHAPTER CITATION	LINE ITEM		
\boxtimes				Facility complies with Chapter 299 (storage/transportation requirements) e provided in subsections (b)(7) and (c)(3).	except as	287.102(a)(2)(i)	1		
\boxtimes				Facility has necessary permits under applicable environmental protection ac operating in compliance.	ts and is	287.102(a)(2)(ii)	2		
\boxtimes				A copy of the Preparedness, Prevention, and Contingency (PPC) Plan consistent with the Department's most recent Guidelines for the Developr Implementation of PPC Plans and is readily accessible.		287.102(a)(3)(i)	3		
\boxtimes				Daily records of weight or volume of waste processed maintained.		287.102(a)(3)(ii)	4		
\boxtimes				Method and location of processing or disposal facilities for wastes recorded.		287.102(a)(3)(ii)	4		
\boxtimes	П	П	П	Waste handling problems or emergencies recorded.		LOTTIONIUM	5		
	Ħ			Facility in compliance with the conditions of the permit by rule.			5		
<u> </u>			Ц	CAPTIVE PROCESSING FACILITY		287.102(a)(3)(ii)	5 6		
<u> </u>				CAPTIVE PROCESSING PACILITY			5		
\boxtimes						287.102(a)(3)(ii) 287.102(a)(6)	5 6 7		
				Facility meets general qualifying requirements.		287.102(a)(3)(ii) 287.102(a)(6) 287.102(a)	5 6 7 8		
\boxtimes				Facility meets general qualifying requirements. Wastes generated solely by the operator and the following conditions are met Remaining waste is managed under the act and the Department's regulations	: 🗆	287.102(a)(3)(ii) 287.102(a)(6)	5 6 7		

Site Name ID Number PAD002268456 Date

AFCO

11/30/04

INSPECTION REPORT - RESIDUAL WASTE DISPOSAL / PROCESSING FACILITIES - PERMIT BY RULE (CONT'D)

1 - No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

	STATUS		8	COMME		CHAPTER	LINE
1	2	3	4	REQUIREMENTS ATT	MENTS	CITATION	ITEM
				CAPTIVE PROCESSING FACILITY (Cont'd)			
\boxtimes				Processing does not have an adverse effect on the public or the environment.		287.102(b)(2)	11
\boxtimes				Processing occurs at the facility where all or some of the waste is generated.		287.102(b)(3)	12
\boxtimes				Operator performs and maintains analyses required by Ch. 287.131-287.133.		287.102(b)(4)	13
				If the waste is burned, it meets the following:			
				 Waste is burned in an enclosed device using controlled flame combustion and is directed through a flue as defined in §121.1. 		287.102(b)(5)(i)	14
	\boxtimes			Waste has more than 5000 BTUs per pound.		287.102(b)(5)(ii)	15
	\boxtimes			 Combustion unit recovers at least 50% of the energy contained in the waste. 		287.102(b)(5)(iii)	16
	\boxtimes			 Amount of energy recovered exceeds the amount of energy used. 		287.102(b)(5)(iv)	17
				If the processing is part of a wastewater treatment process:			
	\boxtimes			 The facility discharges to a stream under an NPDES permit. 		287.102(b)(6)(i)	18
\boxtimes				 The facility discharges to a POTW and is in compliance with applicable pretreatment standards. 		287.102(b)(6)(ii)	19
				If wastewater treatment process includes storage impoundments not in compliance with Chapter 299 the following shall be met:	,	287.102(b)(7)	20
	\boxtimes			 A Water Quality monitoring plan submitted to DEP for review and approval by July 25, 1997, DEP may waive monitoring requirements on a case by case basis. 		287.102(b)(7)(i)	21
	\boxtimes			 Water Quality Monitoring plan shall be implemented within 6 months of DEP approval unless a longer period is provided. Water Quality Monitoring plan shall be implemented by July 4, 2002. 		287.102(b)(7)(ii)	22
	\boxtimes			If groundwater degradation is found that can be reasonably attributed to storage impoundment, operator shall comply with one of the following:		287.102(b)(7)(iii)	23
	\boxtimes			 within 6 months of DEP determination that degradation exists, operator shall file a closure plan and closure schedule. After approval of plan and schedule operator shall implement both as approved. 		287.102(b)(7)(iii)A	24
	\boxtimes			 within 6 months of DEP determination that degradation exists, operator shall submit schedule to upgrade and operate impoundment under Chapter 299, schedule to upgrade and operate the impoundment under Chapter 299 may not exceed 5 years. 		287.102(b)(7)(iii)B	25
\boxtimes				 The operator submits a written notice to DEP including name, address and telephone number of the facility, the individual responsible for operating the facility and a brief description of the facility. 		287.102(b)(8)	26
				WASTEWATER TREATMENT FACILITY			
	\boxtimes			Facility meets general qualifying requirements.		287.102(a)	27
	\boxtimes			Operator performs and maintains analyses required by Ch. 287.131-287.134.		287.102(c)(1)	28
	\boxtimes			The processing is solely part of an industrial or other wastewater treatment process permitted by DEP and one of the following apply:		287.102(c)(2)	29
	\boxtimes			The facility discharges to a stream under an NPDES permit.		287.102(c)(2)(i)	30
	☒			The facility discharges to a PQTW and is in compliance with applicable pretreatment standards.		287.102(c)(2)(ii)	31
				If a wastewater treatment process includes the used storage impoundments that are not in compliance with Chapter 299, the following shall be met:			32
	\boxtimes			 Water Quality Monitoring Plans shall be submitted to DEP for review and approval by July 25, 1997, DEP may waive monitoring requirements on a case by case basis. 		287.102(c)(3)i	33

Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection	November 30,	2004	Identification	Number	PAD002268456
Company/Facility/S	ite Alex C.	Fergusson,	Inc. (AFCO)		

A routine inspection of the hazardous and residual waste handling methods and residual waste Permit-By-Rule operation at Alex C. Fergusson, Inc. (AFCO), located in Charlestown Township, Chester County, was conducted on November 30, 2004 by Melissa Menkevich, Waste Management Specialist, accompanied by Jennifer Wilson, Geologic Specialist, of the Department. Mr. Dave Zmijewski, Chemist, was present for AFCO.

AFCO is a manufacturer of acid and alkaline detergent and sanitizer products, which are utilized primarily in the food industries. Mr. Zmijewski explained that AFCO is planning to move its location to Chambersburg, PA. It is estimated that AFCO will no longer be in its current location in about 6 months. AFCO should subsequently notify the Department of any change in generator status using the "Notification of Regulated Waste Activity" form. AFCO should also obtain a new generator number when it moves to its new location.

A walk-around tour of the facility was lead by Mr. Zmijewski, followed by a paperwork compliance review. The general warehouse area was observed, as well as the hazardous waste storage area. Three partially filled plastic drums were filled with hazardous waste. These drums were marked with the word "waste" and had their original placards, but all hazardous waste drums should be properly labeled with the words "hazardous waste" and dated when in storage. Weekly inspection checklists for the hazardous waste storage area were kept on a clipboard in the storage area, but the most recent checklist was completed on 6/03/04. Hazardous waste storage area checklists are to be completed on a weekly basis, regardless of whether or not waste is present. Mr. Zmijewski claimed that the checklists would be kept complete and upto-date.

Outside, in the front lawn of the facility, the underground residual waste storage tank area was observed. Floor drains in the manufacturing area lead to these tanks. Waste water from equipment washings flow into these drains. Thewastewater is monitored daily for volume and pH, adjusted for pH, and discharged to the local Valley Forge Sewer Authority POTW. Mr. Zmijewski estimated that 200,000 gallons are discharged each month. The discharge testing records for the VFSA were reviewed.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)	Znyel	_Date_	11/30/04
Inspector (signature) Melissa	Markerch	_Date_	11/30/04
			Page 6 of 7

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

ER-WM-129: Rev. 7/95

Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection November 30, 2004 Identification Number PAD002268456

Company/Facility/Site Alex C. Fergusson, Inc. (AFCO)

	Hazardous waste manifests were reviewed. The last shipment was from 10/15/04.
review	AFCO's last employee training session was conducted on 3/25/03. A hazardous waste training for employees should be conducted on an annual basis.
	The facility's PPC plan was reviewed and last updated on 01/31/03.
	AFCO's hazardous waste biennial report for 2003 was reviewed.
	No other observations were noted at this time.
Departm Additio violati Th contain herein. Si	is inspection report is notice of the findings of an inspection conducted by a representative of the ent. This report is formal notification of any violations observed during the inspection. In all notification of violations may be issued concerning either violations noted herein, or other considerations is a result of review of laboratory analyses or Department records. It is report does not constitute an order or other appealable action of the Department. Nothing ed herein shall be deemed to grant or imply immunity from legal action for any violation noted agrature by the person interviewed does not necessarily imply concurrence with the findings on this but does acknowledge that the person was shown the report or that a copy was left with the person.
Porse	$p_{\text{interviewed (signature)}} = \frac{1}{2\sqrt{x}} + \frac{1}{2\sqrt{x}}$
	n interviewed (signature) Lu Znyl Date 11/30/04 ctor (signature) Melessa Merkersel Date 11/30/04
111010	Page 7 of)



Inspection Date	4/3/03
Time Start	10:30 AM

Time Finish 12:00 PM

HAZARDOUS WASTE INSPECTION REPORT GENERATOR GENERATOR GENERATOR

Cor	mpany name <u>Alex C. Fe</u>	rgusson, Inc. (AFCO)	D. Number <u>PAD002268456</u>
Site	Address 25 Spring Mill	Drive, Frazer PA	
Cou	unty Chester	Municipality Charlestown Townshi	ip Zip <u>19355</u>
Nar	me of Inspector Melissa	Menkevich	
Nar	me & Title of Responsib	le Official Mark Weiss, Technical Director; Doug G	Graham, Operations Manager
Per	son Interviewed same a	as above T	elephone (<u>610</u>) <u>647-3300</u>
Mai	ling Address (if different	t from above)	
Am	ount of Hazardous Was	te Generated per Month: > 2200 Po	oundsKgs
1.	Site Characterization:	:	
	STORAGE:	tainer 🔲 Tanks 🔲 Containment Bldg. 🔲 Dri	p Pad Other
	PBR: Neut	tralization/WWTP	Other
	GENERATOR TREAT	MENT Containers Tanks	Containment Bldg.
2.		Large Quantity Handler Small Quantity H	
		ypes	
3.	Hazardous Waste Tra	nsporters:	
	•	Horwith Trucks, Inc.	icense Number PA-AH 0176
		L	
4.		vaste generated and destination facility (location	
	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		T
	Waste Code	Waste Description	Destination Facility
	D002	Waste Corrosive Liquid (contains sodium hydroxide and potassium hydroxide)	Michigan Disposal Waste Treatment Plant, MID0000724831
	D002	RQ Corrosive liquid, acidic, inorganic (contains phosphoric acid and iodine)	Michigan Disposal
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Page _____ of ______

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name Alex C. Fergusson, Inc. (AFCO) ID Number PAD002268456 Date 4/3/03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

51/	AIUS			DEGUIDENENT	PA CIT.	FED. CIT. 40 CFR	LINE NO.
	2	3	4	REQUIREMENT	25 PA Code	T	7
				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
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						262.60	
\boxtimes				Source reduction strategy prepared and available (LQG only)	262a.100		H020
\boxtimes				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name <u>Alex C. Fergusson, Inc. (A</u>	FCO) ID Numbe	r <u>PAD002268456</u>	Date <u>4/3/03</u>
1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

STATUS

STA	STATUS							
1_	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.	
				CONTAINERS (Subchapter I)				
×				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025	
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\boxtimes				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034	
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2540-FM-LRWM0406 Rev. 10/2001



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION 3UREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection	ID	
Field Code		

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

Site Name: Alex C. Fergusson, Inc. (AFCO)	Site I.D.: PAD002268456	Telephone #: 610-647-3300
Municipality: Charlestown Township Responsible Official: Mr. Mark Hinkle Person Interviewed: Mr. Weiss and Mr. Doug Graham Inspector: Melissa Menkevich eFACTS ID #: PF	Site Name: Alex C. Fergusson, Inc. (AFCO)	
Responsible Official: Mr. Mark Hinkle	Address: 25 Spring Mill Drive, Frazer, PA 19355	Address:
Responsible Official: Mr. Mark Hinkle	Municipality Charlestown Township	O
Person Interviewed: Mr. Weissa and Mr. Doug Graham Title: Technical Director and Operations Manager Title: Waste Management Specialist	Responsible Official: Mr. Mark Hinkle	Title: President and CEO
Title: Waste Management Specialist	Person Interviewed: Mr. Weiss and Mr. Doug Graham	Title: Technical Director and Operations Manager
Inspection Date:		
Inspection Date: 4 /03 / 2003 Type: follow-up/routine No. of Violations: 0	eFACTS ID #: PFS	SF
resulting from wash down of equipment and floors Treatment:		
Treatment: ☑ Yes No Type: pH adjustment Type of Storage: ☐ Containers ☑ Tanks ☐ Piles ☐ Impoundments Disposition: Destination Facility Valley Forge Sewer Authority Location:	Waste Description: Dilute acid and alkaline detergent product	S Waste Code: R310
Type of Storage: Containers \text{Tanks} Piles Impoundments Disposition: Destination Facility Valley Forge Sewer Authority Location: Type: Amount Generated: approx. 20,000 gallons/week lb./mo. Waste Description: Waste Code:		
Disposition: Destination Facility Valley Forge Sewer Authority Type:		
Location: Type: Amount Generated: approx, 20,000 gallons/week lb./mo. Waste Description: Waste Code: Treatment: Yes No Type: Type of Storage: Containers Tanks Piles Impoundments Disposition: Destination Facility Description: Type: Amount Generated: Ib./mo. Waste Code: Treatment: Type of Storage: Containers Tanks Piles Impoundments Disposition: Destination Facility Type: Type: Amount Generated: Ib./mo. Waste Code: Type: Treatment: Yes No Type:		
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Waste Description:	Location:	Type:
Treatment: Yes No Type: Type of Storage: Containers Tanks Piles Impoundments Disposition: Destination Facility Type: Type: Location: Type: Ib./mo. Amount Generated: Ib./mo. Waste Code: Treatment: Yes No Type:	Amount Generated: I	b./mo.
Treatment: Yes No Type: Type of Storage: Containers Tanks Piles Impoundments Disposition: Destination Facility Type: Type: Location: Type: Ib./mo. Amount Generated: Ib./mo. Waste Code: Treatment: Yes No Type:	Wasta Daniella	
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Waste Description: Waste Code: Treatment: Yes No Type:		
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Treatment: Yes No Type:	Waste Description:	Waste Code:
Management of the property of		
Disposition: Destination Facility	-	•
Location: Type:		
Amount Generated: lb./mo.		

Site Name ID Number PAD002268456 Date

AFCO

4/3/2003

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

1	STATUS		3			CHAPTER	LINE	
		1.50	NEW POS		GENERAL REQUIREMENTS COMM			Company of Action (C. C.)
	X	n	Ш		Designated facility: valid permit? Permit Number (PA)		287.6	1
		Ħ	Ħ				287.52(a)	2
		Ħ	H	H		П		3
Reduction strategy updated every five years or when waste or manufacturing process changes. 287.53(c) 5 manufacturing process changes. 287.54 6 6 1 1 1 287.54 6 6 1 1 1 287.54 6 6 1 1 1 1 1 1 1 1	-	Ħ	H	H		Ī		4
					Reduction strategy updated every five years or when waste or			5
Annual analysis or certification of waste submitted to Department and designated facility. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or manufacturing process changes. Chemical analysis updated every five years or when waste or when waste or cannufacture process find processing processing analysis updated every five years or when waste or cannufacturing process fanges. Chemical analysis updated every five years or when waste or cannufacturing process fanges. Chemical analysis updated every five years or when waste or cannufacturing process fanges and containers. Chemical analysis updated every five years or when waste or when waste or cannufacturing process fanges and containers. Chemical analysis updated every five years or when waste or when waste or cannufacturing process fanges. Chemical analysis updated every five years or when waste or when waste or when waste or waste. Chemical analysis updated every five years or when waste or when waste or cannufacturing process gard. Chemical analysis updated every five years. Chemical analysis updated every five years. Chemical analysis updated every five years. Chemical analysis updated every five years.	N	П	П	П		П	287.54	6
Chemical analysis updated every five years or when waste or manufacturing process changes. 287.54(g) 8					Annual analysis or certification of waste submitted to Department and			7
☑ ☐ ☐ Generator record keeping requirements. ☐ 287.55 9 ☑ ☐ ☐ Operation of disposal or processing facility without a permit. ☐ 287.101(a) 10 STORAGE REQUIREMENTS ☐ ☐ 299.111(1) 11 ☐ ☐ ☐ Residual waste not mixed with hazardous waste. ☐ 299.111(2) 12 ☐ ☐ ☐ Residual waste not mixed with special handling waste. ☐ 299.111(3) 13 ☐ ☐ Residual waste not mixed with special handling waste. ☐ 299.111(4) 14 ☐ ☐ Waste not blown or otherwise deposited outside storage area. ☐ 299.111(4) 14 ☐ ☐ Waste not blown or otherwise deposited outside storage area. ☐ 299.112(6) 15 ☐ ☐ All waste stored less than one year. ☐ 299.112(6) 15 ☐ ☐ All waste stored less than one year. ☐ 299.114(a) 17 ☐ ☐ All waste stored less than one year.	\boxtimes				Chemical analysis updated every five years or when waste or		287.54(g)	8
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2540-FM-LRWM0125 Rev. 9/2001



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection	ID
Field Code	

INSPECTION REPORT - RE	SIDUAL WASTE DISPOSAL
PROCESSING FACILIT	TIES - PERMIT BY BUILE

				02268456	Telephone #: 610-647-3300				
		ame:			Operator Name:				
Ad	dres	ss: <u>2</u>	5 Sp	ring Mill Drive, Frazer, PA 19355	Address:				
Mı	ınici	nality	r Ch	narlestown Township	County : Chester				
				icial: Mr. Mike Hinkle	Title: President and CEO				
				ved: Mr. Mark Weiss and Mr. Doug Graham	Title: Techinical Director ar	id O	perations Manag	er	
				ssa Menkevich	Title: Waste Management S				
eF.	ACT	SID	#:	PF SF _					
Ins	рес	tion [Date	: _04 /03 / 03 Type: _follow-up/routine	No. of Violations: 0		Time: 10:30		
Da	ys/V	Veek	Оре	erated: 24/7					
1.	-	ype	of P	rocess: pH adjustment (neutralization)					
3.	- - 1	Гурез	s of F	Residual Waste Processed: Dilute acid and alka	line wastewater from plant floor	and	d equipment was	hings	
	et/	ATUS		No Violation Observed 2 - Not-Applicable			ompliance CHAPTER	LINE	
1	2	3	4	REQUIREMENT	COMMEI ATTACK		CITATION	ITEM	
☒				Facility complies with Chapter 299 (storage/transportations (b)(7) and (c)(3).	ortation requirements) except as		287.102(a)(2)(i)	1	
\boxtimes				Facility has necessary permits under applicable envolverating in compliance.	ironmental protection acts and is		287.102(a)(2)(ii)	2	
Ø				A copy of the Preparedness, Prevention, and C consistent with the Department's most recent Guid Implementation of PPC Plans and is readily accessib	lelines for the Development and		287.102(a)(3)(i)	3	
Ø				Daily records of weight or volume of waste processed	l maintained.		287.102(a)(3)(ii)	4	
\boxtimes				Method and location of processing or disposal facilities			287.102(a)(3)(ii)	5	
Ø				Waste handling problems or emergencies recorded.			287.102(a)(3)(ii)		
\boxtimes				Facility in compliance with the conditions of the permi	t bv rule.		287.102(a)(6)	6	
_				CAPTIVE PROCESSING FAC				7	
Ø				Facility meets general qualifying requirements.					
				racility ineets deficial adminimic reminements		\Box		7	
<u></u>		붜	 		owing conditions are met:		287.102(a)	7	
				Wastes generated solely by the operator and the follon Remaining waste is managed under the act and the I				7	

Site Name	
ID Number	
Date	

INSPECTION REPORT - RESIDUAL WASTE DISPOSAL / PROCESSING FACILITIES - PERMIT BY RULE (CONT'D)

1 - No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS		3	COMM	ENTS	CHAPTER	LINE	
1	2	3	4	REQUIREMENTS ATTA		CITATION	ITEM
				CAPTIVE PROCESSING FACILITY (Cont'd)			
\boxtimes				Processing does not have an adverse effect on the public or the environment.		287.102(b)(2)	11
\boxtimes				Processing occurs at the facility where all or some of the waste is generated.		287.102(b)(3)	12
\boxtimes				Operator performs and maintains analyses required by Ch. 287.131-287.133.		287.102(b)(4)	13
				If the waste is burned, it meets the following:			
	\boxtimes			 Waste is burned in an enclosed device using controlled flame combustion and is directed through a flue as defined in §121.1. 		287.102(b)(5)(i)	14
	\boxtimes			 Waste has more than 5000 BTUs per pound. 		287.102(b)(5)(ii)	15
	\boxtimes			 Combustion unit recovers at least 50% of the energy contained in the waste. 		287.102(b)(5)(iii)	16
	\boxtimes			Amount of energy recovered exceeds the amount of energy used.		287.102(b)(5)(iv)	17
				If the processing is part of a wastewater treatment process:			
	\boxtimes			■ The facility discharges to a stream under an NPDES permit.		287.102(b)(6)(i)	18
☒				The facility discharges to a POTW and is in compliance with applicable pretreatment standards.		287.102(b)(6)(ii)	19
				If wastewater treatment process includes storage impoundments not in compliance with Chapter 299 the following shall be met:		287.102(b)(7)	20
	\boxtimes			 A Water Quality monitoring plan submitted to DEP for review and approval by July 25, 1997, DEP may waive monitoring requirements on a case by case basis. 		287.102(b)(7)(i)	21
	⊠			 Water Quality Monitoring plan shall be implemented within 6 months of DEP approval unless a longer period is provided. Water Quality Monitoring plan shall be implemented by July 4, 2002. 		287.102(b)(7)(ii)	22
	\boxtimes			If groundwater degradation is found that can be reasonably attributed to storage impoundment, operator shall comply with one of the following:		287.102(b)(7)(iii)	23
	×			 within 6 months of DEP determination that degradation exists, operator shall file a closure plan and closure schedule. After approval of plan and schedule operator shall implement both as approved. 		287.102(b)(7)(iii)A	24
	\boxtimes			 within 6 months of DEP determination that degradation exists, operator shall submit schedule to upgrade and operate impoundment under Chapter 299, schedule to upgrade and operate the impoundment under Chapter 299 may not exceed 5 years. 		287.102(b)(7)(iii)B	25
Ø				The operator submits a written notice to DEP including name, address and telephone number of the facility, the individual responsible for operating the facility and a brief description of the facility.		287.102(b)(8)	26
				WASTEWATER TREATMENT FACILITY			
	\boxtimes			Facility meets general qualifying requirements.		287.102(a)	27
	Ø			Operator performs and maintains analyses required by Ch. 287.131-287.134.		287.102(c)(1)	28
	☒			The processing is solely part of an industrial or other wastewater treatment process permitted by DEP and one of the following apply:		287.102(c)(2)	29
	Ø			The facility discharges to a stream under an NPDES permit.		287.102(c)(2)(i)	30
	☒			The facility discharges to a POTW and is in compliance with applicable pretreatment standards.		287.102(c)(2)(ii)	31
				If a wastewater treatment process includes the used storage impoundments that are not in compliance with Chapter 299, the following shall be met:			32
	☒			Water Quality Monitoring Plans shall be submitted to DEP for review and approval by July 25, 1997, DEP may waive monitoring requirements on a case by case basis.		287.102(c)(3)i	33

Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection April 3, 2003	Identification Number PAD002268456
Company/Facility/Site Alex C. Fergusson	Inc. (AFCO)

A follow-up inspection of the hazardous and residual waste handling methods and residual waste Permit-By-Rule operation at Alex C. Fergusson, Inc. (AFCO), located in Charlestown Township, Chester County, was conducted on April 3, 2003 by Melissa Menkevich, accompanied by Andrew Sinclair, Waste Management Specialists, of the Department. Mr. Mark Weiss, Technical Director, and Mr. Doug Graham, Operations Manager, were present for AFCO.

AFCO is a manufacturer of acid and alkaline detergent and sanitizer products, which are utilized primary in the food industries. A walk-around tour of the facility was lead by Mr. Weiss and Mr. Graham, followed by a paperwork compliance review. Since the Department's last inspection of 11/25/02, AFCO has worked diligently to "clean house" and to come into compliance.

The general warehouse area was observed, as well as the hazardous waste storage area. The hazardous waste storage area was well labeled and well contained, not only with pallet containment for individual storage containers, but also with a trench drain system for the whole area, which leads to the residual waste storage tanks outside. This proper containment and collection system corrects the previously cited violations of PA Code 265a.179 and PA Code 265a.175. One acid waste storage tote was present in the hazardous waste storage area during the inspection, labeled with its contents and dated 3/24/03. Having storage of hazardous waste not exceed ninety days corrects the violation of 40 CFR 262.34(a), and having the hazardous waste storage containers properly labeled with their contents, the words "hazardous waste," and their accumulation date visible for inspection corrects the violations of 40 CFR 262.34(a)(2), 40 CFR 262.34(a)(3), and the Solid Waste Management Act (SWMA) 6018.403(b)(2). Weekly inspection checklists for the hazardous waste storage area were also kept on a clipboard in the storage area, correcting the violation of 40 CFR 265.174. It is recommended that the checklists have an area for inspector comments, and a clear way to designate if any corrective actions are to be taken.

Outside, in the front lawn of the facility, the underground residual waste storage tank area was observed. Floor drains in the manufacturing area lead to these tanks, where the wastewater is monitored daily for volume and pH, adjusted for pH, and discharged to the local Delaware Valley Sewer Authority

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature)

ER-WM-129: Rev. 7/95

Commonwealth of Pennsylvania Department of Environmental Protection Bureau of Land Recycling & Waste Management

Inspection Report Comments

Date of Inspection April 3, 2003 Identification Number PAD002268456
Company/Facility/Site Alex C. Fergusson, Inc. (AFCO)
POTW. Mr. Graham explained that AFCO has ten 5,000-gallon capacity tanks, that the tanks are pumped out about every 2 or 3 days, and that a normal pumping would consist of about 9,000 gallons. Mr. Graham claimed that AFCO plans to perhaps construct a fence around the tank area, and that a "Residual Waste - Waste Water" sign would be placed on the fence in order to comply with residual waste tank labeling requirements. AFCO has notified the Department in writing of their wastewater neutralization Permit-by-Rule activity, through a letter dated February 3, 2003, correcting the violation of PA Code 287.102(b)(8). Inspection record keeping requirements for the facility and residual waste operation/storage area were in compliance and should be maintained, correcting the violation of PA Code 299.122(c).
A paperwork review was conducted. Manifests were reviewed. Four hazardous waste shipments occurred in January, all of large quantity due to a "cleaning house" and disposal of old, unusable product. The last shipment was from 2/26/03. All manifests were completed properly and in compliance.
AFCO's hazardous waste employee training records were reviewed and were found to be in compliance. An employee training session was conducted on 3/25/03, correcting the violation of 40 CFR 265.16.
The facility's PPC plan was reviewed and last updated on 01/31/03. All relevant personnel changes had been updated, and proper emergency coordinators designated.
Form 25R (Source Reduction Strategy) had been completed for both hazardous and residual waste and were in compliance, correcting the violations of PA Code 262a.100 and PA Code 287.53, respectively.
AFCO's hazardous waste biennial report for 2001 was reviewed, as well as AFCO's residual waste biennial reports for 2000 and 2002, correcting the violation of PA Code 287.52 and PA Code 287.54.
No violations were noted. The Department encourages AFCO to maintain its high level of compliance.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Mailed to tacility Date Inspector (signature) Melecare Date 1/16/03 Page 1 of 9
Inspector (signature) / lelesson / Hake ach Date 4/16/03
Page // of //



Time Start 12:45 CM

Time Finish Fpt complete

11/26/27 3FM

HAZARDOUS WASTE INSPECTION REPORT

☐ SQ GENERATOR

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AFCO Mpany name Alex	C Fergusson Inc	I.D. Number <u>PAN 00324845</u> 6
le Address 25 50	The IT III I'M FOUT IN	
unty Chester	Municipality Charleston	- Tour Zip 19355
me of Inspector And	tree Sindair Melissa	Menkeuch
me & Title of Responsib	ole Official Me, Ken West	& Frankle Honkle
rson Interviewed <u>SAA</u>	Dava Znijewski Mark Deiss	Telephone (610) 647-3300
	nt from above)	
nount of Hazardous Was	ste Generated per Month: > 22.00 F	Pounds Kgs
Site Characterization	:	
STORAGE: X Con	tainer 🔲 Tanks 🔲 Containment Bldg. 🔲 🗅	rip Pad Other
PBR: Neu	tralization/WWTP 🔲 Reclaim	Other
GENERATOR TREAT	MENT Containers Tanks	Containment Bldg. Drip Pac
Universal Waste:	Large Quantity Handler	Handler
Universal Waste T	ypes	
Hazardous Waste Tra	The state of the s	_
Transporter Name	Horwith Trucks In	License Number PA AH 0176
Transporter Name		License Number
Transporter Name		License Number
Types of hazardous v	vaste generated and destination facility (loca	tion & type).
Waste Code	Waste Description .	Destination Facility
D002	Det Corraine Liquid	Michigan Disposal Da
	Cardian by draxide, potoestant	deside) Treatmen Pl
Door	Wet Corrosive (phosphore aiden	
DODI FOOT, FOOT	Rol Dart Flamm Liquids	EQ Resource Pressur,
,	Carotana & xylen	MID 060975844
	Corresses Sild (sedim metas) is	MOWTE

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name	AFCO	ID Nur	mber <u>PADO02268456</u>	Date 11/25/07
	1 - No Violation Observed	2 - Not Applicable	a 3 - Not Determined	4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
Х				Authorized transporters only	262a.10	262.12(c)	H003
		X		Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
			×	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	y			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	×			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
	x			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
			X	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
		x		Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
		λ		Specified records retained for three years	262a.10	262.40(c)	H014
У				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
×				Exception reporting procedures followed	262a.42	262.42	H016
×				Spill reporting procedures followed	262a.10	262.34(d)	H017
		х		PPC plan developed and implemented	262a.10	262.34(a)	H018
	x			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
			×	Source reduction strategy prepared and available (LQG only)	262a.100		H020
¥				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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Page		of	1

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS **FACILITY SPECIFICS**

Site Name	SECO	ID Number	PADOOS	068456	Date	11/25/02	AMERICAN TO SERVICE AND ADDRESS OF THE PERSON OF THE PERSO

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
T	T	T	T	CONTAINERS (Subchapter I)			
			X	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
×				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
х				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		нозо
			X	Container storage areas inspected at least weekly	265a.1	265.174	H031
×		ļ		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
			×	Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
)	<	Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
			X	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			7	Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037



Inspection ID	
Field Code	

INSPECTION REPORT - RESIDUAL WASTE GENERATOR

eFACTS ID #: PF	Operator Name: Address: County: Choose Cool Title: Preschaft Cool Address:
· · · · · · · · · · · · · · · · · · ·	
	Waste Code:
Type of Storage: Containers Tanks	☐ Piles ☐ Impoundments
•	Type:
Amount Generated:	

Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks	Piles Impoundments
Disposition: Destination Facility	
Location:	Type:
Amount Generated:	lb./mo.
Waste Description:	Waste Code:
Treatment: Yes No Type:	
Type of Storage: Containers Tanks] Piles [] Impoundments
Disposition: Destination Facility	
	Type:
Amount Generated:	lb./mo.
	Waste Code:
Type of Storage: Containers Tanks	· · · · · · · · · · · · · · · · · · ·
•	
Location:	· · · · · · · · · · · · · · · · · · ·
Amount Generated:	

Site Name AFC 6
ID Number PARADOSAUS 456

INSPECTION REPORT - RESIDUAL WASTE GENERATOR (Cont'd)

1 - No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - Non-Compliance

STATUS 1 2 3 4 GENERAL REQUIREMENTS COMMENTS CITATION FIRM 1 2 3 4 GENERAL REQUIREMENTS ATTACHED 1			******		No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 -	NOH-	Compliance	
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manufacturing process changes. 287.54 6 7 4 4 4 4 4 4 4 4 4	Щ	H	┞			Ц		
□ □ X Annual analysis or certification of waste submitted to Department and designated facility. 287.54(b)(f) 7 designated facility. □ □ Chemical analysis updated every five years or when waste or manufacturing process changes. 287.54(g) 8 □ □ Generator record keeping requirements. □ 287.50(g) 9 □ □ Generator record keeping requirements. □ 287.101(a) 10 □ Operation of disposal or processing facility without a permit. □ 287.101(a) 10 □ STORAGE REQUIREMENTS □ 299.111(1) 11 □ □ Waste stored as not to create a safety risk. □ 299.111(3) 13 □ □ Residual waste not mixed with special handling waste. □ 299.111(3) 13 □ □ Waste not blown or otherwise deposited outside storage area. □ 299.111(4) 14 □ □ Waste not blown or otherwise deposited outside storage area. □ 299.111(2) 15 □ □ □ All waste stored less than one year. □ 299.1112(c) 15 □ □				XI			287.53(c)	5
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				X			287.54(b)(f)	7
□ □ □ Chemical analysis updated every five years or when waste or manufacturing process changes. 287.54(g) 8 □ □ □ Generator record keeping requirements. □ 287.55 9 □ □ Operation of disposal or processing facility without a permit. □ 287.101(a) 10 STORAGE REQUIREMENTS □ □ Waste stored as not to create a safety risk. □ 299.111(1) 11 □ □ Waste stored as not to create a safety risk. □ 299.111(3) 13 □ □ Residual waste not mixed with special handling waste. □ 299.111(4) 14 □ □ Residual waste not blown or otherwise deposited outside storage area. □ 299.111(4) 14 □ □ □ Waste not blown or otherwise deposited outside storage area. □ 299.113(a) 16 □ □ □ All waste stored less than one year. □ 299.112(c) 15 □ □ □ All waste stored less than one year. □ 299.112(c) 15 □ □ □ Equ		_					\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
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					manufacturing process changes.			
STORAGE REQUIREMENTS	X				Generator record keeping requirements.		287.55	9
Residual waste not mixed with hazardous waste.	X				Operation of disposal or processing facility without a permit.		287.101(a)	10
□ □ Waste stored as not to create a safety risk. □ 299.111(2) 12 □ □ Residual waste not mixed with special handling waste. □ 299.111(3) 13 □ □ Waste not blown or otherwise deposited outside storage area. □ 299.111(4) 14 □ □ Storage area inspected; records available. □ 299.113(a) 16 □ □ All waste stored less than one year. □ 299.113(a) 16 □ □ □ Equipment maintained in operable condition. □ 299.114(a) 17 □ □ □ Equipment deaning frequencies maintained. □ 299.114(c) 18 □ □ □ Vectors controlled and minimized. □ 287.115 19 □ □ □ Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law. □ 299.116(a)(b) 20 □ □ □ Waste stored to prevent groundwater degradation. □ 299.116(c) 21 □ □ □ Sufficient number of properly constructed storage containers. □ <td< td=""><td></td><td></td><td></td><td></td><td>STORAGE REQUIREMENTS</td><td></td><td></td><td></td></td<>					STORAGE REQUIREMENTS			
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□ □ □ Waste storage pile area properly designed, constructed and maintained. □ 299.131 28 □ □ □ Storage pad or liner system properly designed and maintained. □ 299.132 29 □ □ □ Proper design and maintenance of leachate and runoff control systems. □ 299.133 30 □ □ □ Proper storage and containment of incinerator ash residue. □ 299.151 31 □ □ □ Proper storage and containment of fnable asbestos containing waste. □ 299.152 32 □ □ □ □ Proper storage and containment of coal ash. □ 299.153 33 □ □ □ □ Proper storage and containment of PCB containing waste material. □ 299.154 34		*	Ш	Ш	No putrescible waste or liquid waste stored in piles.	Ц		27
□ □ Storage pad or liner system properly designed and maintained. □ 299.132 29 □ □ □ Proper design and maintenance of leachate and runoff control systems. □ 299.133 30 □ □ □ Proper storage and containment of incinerator ash residue. □ 299.151 31 □ □ □ Proper storage and containment of friable asbestos containing waste. □ 299.152 32 □ □ □ Proper storage and containment of coal ash. □ 299.153 33 □ □ □ □ Proper storage and containment of PCB containing waste material. □ 299.154 34					Waste storage pile area properly designed, constructed and maintained.			28
□ □ □ □ Proper design and maintenance of leachate and runoff control systems. □ 299.133 30 □ □ □ Proper storage and containment of incinerator ash residue. □ 299.151 31 □ □ □ Proper storage and containment of friable asbestos containing waste. □ 299.152 32 □ □ □ Proper storage and containment of coal ash. □ 299.153 33 □ □ □ Proper storage and containment of PCB containing waste material. □ 299.154 34							299.132	29
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Proper storage and containment of coal ash. 299.153 33 Proper storage and containment of PCB containing waste material. 299.154 34		V						32
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2540-FM-LRWM0125 Rev. 7/2001



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection	ID	 _

	_		
Siald.	Code		

INSPECTION REPORT - RESIDUAL WASTE DISPOSAL / PROCESSING FACILITIES - PERMIT BY RULE

Sit	le Na Idres	ame: ss: _		5002268456 Telephone #: 610-6 FCO Operator Name:						
Mı R∈	unici espo	pality nsible	/: <u>. (</u> e Of	ficial: Mr. M. M. M. M. Title: Pro- (50) Wed: 52 60. Title:						
Ins	spec	tor:		70524 Title:						
eF.	ACT	SID	#:	PF						
Ins	spec	tion l	Date	: IL ISSI 2007 Type: No. of Violations:		Time:				
Da	ıys/V	Veek	Оре	erated:						
1.	-	Гуре	of P	rocess:: pH adjustment (neutralisation)						
2.	-	Amou	ınt o	f Residual Waste Processed:						
3.		Гуре	s of l	Residual Waste Processed: Waster from plant f	boo	r costri				
			1 -	No Violation Observed 2 - Not-Applicable 3 - Not-Determined 4 - N	on-C	ompliance				
1		ATUS	4	COMM REQUIREMENT ATTA		CHAPTER CITATION	LINE			
כ		Ø		Facility complies with Chapter 299 (storage/transportation requirements) except as provided in subsections (b)(7) and (c)(3).		287.102(a)(2)(i)	1			
X				Facility has necessary permits under applicable environmental protection acts and is operating in compliance.		287.102(a)(2)(ii)	2			
		X		A copy of the Preparedness, Prevention, and Contingency (PPC) Plan that is 287.102(a)(3)(i) 3 consistent with the Department's most recent Guidelines for the Development and Implementation of PPC Plans and is readily accessible.						
Ø				Daily records of weight or volume of waste processed maintained.		287.102(a)(3)(ii)	4			
X				Method and location of processing or disposal facilities for wastes recorded.		287.102(a)(3)(ii)	5			
		図		Waste handling problems or emergencies recorded.		287.102(a)(3)(ii)	6			
		$\overline{\boxtimes}$		Facility in compliance with the conditions of the permit by rule.		287.102(a)(6)	7			
				CAPTIVE PROCESSING FACILITY						
1				Facility meets general qualifying requirements.		287.102(a)				
7			_	Wastes generated solely by the operator and the following conditions are met:			8			
	\Box	X	\Box	vvastes denerated solety by the operator and the following conditions are met		287.102(b)	8			

Site Name	
D Number	
3-4-	

INSPECTION REPORT - RESIDUAL WASTE DISPOSAL / PROCESSING FACILITIES - PERMIT BY RULE (CONT'D)

\$2000000	0000000000	********	2000000000000	1 - No Violation Observed 2-Not-Applicable 3-Not-Determined 4-I	von-Co	mpliance		
1	ST/	ATU 3	S 4		MMENTS TACHED	CHAPTER CITATION	LINE	
				CAPTIVE PROCESSING FACILITY (Cont'd)				
X				Processing does not have an adverse effect on the public or the environment.		287.102(b)(2)	11	
X				Processing occurs at the facility where all or some of the waste is generated.		287.102(b)(3)	12	
		X		Operator performs and maintains analyses required by Ch. 287.131-287.133.		287.102(b)(4)	13	
				If the waste is burned, it meets the following:				
	Ø			 Waste is burned in an enclosed device using controlled flame combustion and is directed through a flue as defined in §121.1. 	287.102(b)(5)(i)	14		
	区			Waste has more than 5000 BTUs per pound.	287.102(b)(5)(ii)	15		
	X			Combustion unit recovers at least 50% of the energy contained in the waste.		287.102(b)(5)(iii)	16	
	図			Amount of energy recovered exceeds the amount of energy used.		287.102(b)(5)(iv)	17	
				If the processing is part of a wastewater treatment process:		_		
	X			The facility discharges to a stream under an NPDES permit.		287.102(b)(6)(i)	18	
X				 The facility discharges to a POTW and is in compliance with applicable pretreatment standards. 		287.102(b)(6)(ii)	19	
				If wastewater treatment process includes storage impoundments not in compliance with Chapter 299 the following shall be met:		287.102(b)(7)	20	
	X			 A Water Quality monitoring plan submitted to DEP for review and approval by July 25, 1997, DEP may waive monitoring requirements on a case by case basis. 		287.102(b)(7)(i)	21	
	X			■ Water Quality Monitoring plan shall be implemented within 6 months of DEP approval unless a longer period is provided. Water Quality Monitoring plan shall be implemented by July 4, 2002.				
	Ø			 If groundwater degradation is found that can be reasonably attributed to storage impoundment, operator shall comply with one of the following: 		287.102(b)(7)(iii)	23	
	Σ)			 within 6 months of DEP determination that degradation exists, operator shall file a closure plan and closure schedule. After approval of plan and schedule operator shall implement both as approved. 		287.102(b)(7)(iii)A	24	
	X			 within 6 months of DEP determination that degradation exists, operator shall submit schedule to upgrade and operate impoundment under Chapter 299, schedule to upgrade and operate the impoundment under Chapter 299 may not exceed 5 years. 		287.102(b)(7)(iii)B	25	
			X	 The operator submits a written notice to DEP including name, address and telephone number of the facility, the individual responsible for operating the facility and a brief description of the facility. 		287.102(b)(8)	26	
				WASTEWATER TREATMENT FACILITY				
				Facility meets general qualifying requirements.		287.102(a)	27	
				Operator performs and maintains analyses required by Ch. 287.131-287.134.		287.102(c)(1)	28	
				The processing is solely part of an industrial or other wastewater treatment process permitted by DEP and one of the following apply:		287.102(c)(2)	29	
				The facility discharges to a stream under an NPDES permit.		287.102(c)(2)(i)	30	
				The facility discharges to a POTW and is in compliance with applicable pretreatment standards.		287.102(c)(2)(ii)	31	
				If a wastewater treatment process includes the used storage impoundments that are not in compliance with Chapter 299, the following shall be met:			32	
				 Water Quality Monitoring Plans shall be submitted to DEP for review and approval by July 25, 1997, DEP may waive monitoring requirements on a case by case basis. 		287.102(c)(3)i	33	

INSPECTION REPORT COMMENTS

INSPECTION REPORT COMMENTS
Date of inspection11 - 25 - 2002ldentification NumberPAD002268458
Company/Facility/Site NameAFCO - Alex C Fergusson, Inc
On November 25, 2002, Ms. Melissa Menkevich and I (Andrew Sinclair) conducted a routine large quantity generator of hazardous waste inspection of Alex C. Fergusson, Inc located at 25 Spring Mill Dr. Frazer, PA 19355 in Charlestown Township, Chester County. Mr. Ken West, Mark Weiss, and Mr. Dave Zmijewski were present during the inspection. Alex C. Fergusson, Inc. is a manufacturer of industrial cleaners. Raw materials are dry or liquid blended into various products. The inspection is also in response to a recent incident of a spill of DDBSA that had sprayed a driver of the raw material on-site. The spilled material was contained on a cement lot at the rear of the facility. After review of manifests for 2001 and 2002, it has been determined that Alex C. Fergusson is a large quantity generator of hazardous waste. The facility had submitted a notification to the Department on February 21, 2002 with the 2001 hazardous waste biennial report, however, no indication on the databases or copies of recent notifications indicate that a notification had been received. The facility should ensure that the information was received. Hazardous wastes generated are off-spec material from the blending processes that cannot be re-worked into various products. The majorities of the hazardous wastes are characteristic for corrosivity and include corrosive liquids of sodium hydroxide, potassium hydroxide, phosphoric acid, and nitric acids and corrosive solids of sodium hydroxide and sodium metasilicate.
Compatible mixtures of hazardous wastes are accumulated in totes and stored within the warehouse/manufacturing area. Typically, the hazardous waste is stored for approximately six months. Twelve full 275-gallon totes were observed. Mr. West stated that the last shipment had occurred in October and that approximately six totes were left behind since the remainder of the waste would not fill the truck. The transporter visibly labeled two totes the day of the previous shipment, 10-15-02. The volume of waste generated since that time indicates that the facility is a large quantity generator of hazardous waste. According to discussions with Mr. West, hazardous waste has been stored for up to six months, thus greater than ninety-day storage. Exceeding ninety-day storage is contrary to 40 CFR 262.34(a) . Of the twelve totes of hazardous waste, only two were properly labeled. The remaining hazardous waste containers had not been clearly marked with the accumulation date and visible for inspection, labeled as "Hazardous Waste", or labeled accurately to identify the contents contrary to 40 CFR 262.34(a)(2) , 40 CFR 262.34(a)(3), and the Solid Waste Management Act (SWMA) 6018.403(b)(2). At the time of the inspection, the facility was unable to demonstrate that the proper containment and collection systems are in place contrary to PA Code 265a.179 and PA Code 265a.175 . There is no separate secondary containment for the hazardous waste storage area; however, it may be possible that the facility may provide containment in its entirety. The facility's interior drains lead to a series of underground tanks in which floor wash wastewater is stored, tested, treated (pH adjusted), and then discharged to the POTW via a manual
valve. If the facility can demonstrate that there are no cracks and gaps in the flooring, materials that spilled waste may contact are compatible, and that proper drainage leads to sufficient storage capacity of the tank system is available at any time to ensure proper containment for the storage of waste.
The six fiber drums of waste DDBSA contaminated "stay-dry" and one steel drum of waste DDBSA liquid should be properly labeled and closed. One of the six drums of waste stay-dry contained free liquid waste DDBSA, more stay-dry is intended to be added prior to shipment. The liquid DDBSA was vacuumed from the ground during the spill cleanup of the November 7, 2002 dodecylbensenesulphonic acid spill. The spill occurred as a result of operator error by the hauler of the material. Some remaining stay-dry remains on the surface of the cement and should be removed and properly disposed. Discolorations of the cement surface are visible from the spill. Mr. West stated that a floor scrubber commonly used within the facility would be used to remove any residual spilled material remaining. No spilled material reached the soil or surface water drainage areas. There is a containment tank for the outside lot that had been installed after a 1996 spill of sodium hydroxide during a truck loading. The pH of surface water collected from the drainage of the lot is tested prior to manual discharge of the rainwater off-site. Mr. West stated that the spill cleanup wastes would be disposed this week or by
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) many A Wigns Date 11/24/02
Inspector (signature) Andre 1 Santa Date 11/20/07

Page \nearrow of $\cancel{9}$

ER-WM.-129: Rev. 10/95

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

INSPECTION REPORT COMMENTS
Date of inspection 11 - 25 - 2002 Identification Number PAD002268458
Company/Facility/Site Name AFCO - Alex C Fergusson, Inc
the following Thursday of next week. Records have not been maintained indicating weekly inspections of hazardous waste storage areas contrary to 40 CFR 265.174. No personnel training or annual review, per 40 CFR 265.16, was provided for employees that manage hazardous waste or respond to incidents contrary to 40 CFR 265.16. Such records should be maintained. The facility's PPC plan was last updated in September 2001. Some personnel changes have occurred and some paragraphs were within the plan were outdated such as the indication that no hazardous wastes are stored on-site. The PPC should be updated; the Department's waste guidelines were provided, however, the facility should incorporate the information in other possible similar documents required by other regulatory bureaus such as water quality or the requirements by the POTW. A hazardous waste source reduction strategy has not been prepared and available contrary to PA Code 262a.100. Mr. Hinkle, President and CEO, stated that the facility would review potential method of reducing the wastes generated on-site. Generally, the facility attempts to utilize off-spec material in other products or sell materials not to be used on-site to other companies. As a large quantity generator of hazardous waste, a source reduction strategy should be maintained and updated every five years. Forms 25R may be accessed via the internet as forms for a source reduction strategy. According the facility, EWMI (Environmental Waste Minimumization, Inc.) generally manages the hazardous waste streams. Typically, Horwith Trucks, Inc (PAD146714878) transports the hazardous waste corrosives to Michigan Disposal Waste Treatment Plant in Belleville, MI and the ignitable hazardous waste to EQ Resource Recovery, Inc. in Romulus, MI. The facility should ensure that the waste codes indicated on the manifests are accurate. Manifests should be retained for three years
AFCO is additionally a large quantity generator of residual waste per review of the volumes of discharged waste wash water to the POTW. The facility was not aware of the Department's residual waste regulations; a hard copy of the regulations was provided. According to Mr. Zmijewski, Chemist, the pH of the wastewater collected within the underground storage tanks as noted earlier is typically between ten and eleven. As a large quantity generator of residual waste, a biennial report and annual analysis or certification of waste has not been submitted to the Department contrary PA Code 287.52 and PA Code 287.54. A source reduction strategy for residual wastes was not on file contrary to PA Code 287.53. Residual waste storage areas have not been routinely inspected and documented contrary to PA Code 299.122(c). The facility should ensure that residual wastestorage tanks meet the design standards per PA Code 299.122. The facility processes the residual wastewater prior to discharge to the POTW, Valley Forge Sewer Authority. Ten underground tanks and a clarifier are used. The pH is adjusted. The volume of wastewater after processing is metered and charted. The tanks had recently been emptied in inspected, however, this was not documented. The facility should ensure that proper records are maintained such analyses, routine maintenance, and treatment records. The facility may process the waste as long as it meets the requirements of the captive processing permit-by-rule. AFCO has not submitted a written notice to the Department contrary to PA Code 287.102(b)(8). Within fourteen (14) days of the receipt of this report, AFCO (Alex C Fergusson, Inc) should submit to the Department a schedule and plan detailing what actions the facility intends to take to correct and prevent the violations noted.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violation identified as a result of review of laboratory analyses or Department records. This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or implement immunity from legal action for any violation noted herein. Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Mail A Light
Inspector (signature) Date 1/26/02

Page $\frac{9}{2}$ of $\frac{9}{2}$

SEPA		ON OF HAZARDO	OUS WASTE A	CTIVITY	INSTRUCTIONS: If you received a preprinted
INSTALLA- TION'S EPA		10	RCR	ECEIVED	label, affix it in the space at left. If any of the information on the label is incorrect, draw a line
I.D. NO.		Jerged to generation	EPA	REGION TI	information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items 1, II, and III
I. STALLATION		agerata	No. I 1	00000	complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted
INSTALLA-	l				below blank. If you did not receive a preprinted Qba , complete all items. "Installation" means a single site where hazardous waste is generated,
II. MAILING ADDRESS	PLEAS	E PLACE LABEL	IN THIS SPAC	CE	treated, stored and/or disposed of, or a trans- porter's principal place of business, Please refer
					to the INSTRUCTIONS FOR FILING NOTIFI- CATION before completing this form, The
LOCATION III OF INSTAL- LATION					information requested herein is required by law (Section 3010 of the Resource Conservation and
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IV. INSTALLAT					
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V. OWNERSHIP		A. NAME OF INSTAL	LATION'S LEGAL	OWNER	
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15 16	OWNERSHIP into box)	VI TYPE OF HAZAE	DOUS WASTE	ACTIVITY /a	nter "X" in the appropriate box(es))
(enter the appropri	iate letter into box)	A-GENERA	TION A		TRANSPORTATION (complete item VII)
F = FEDERA M = NON-FE		THE TREATIS	TORE/DISPOSE		UNDERGROUND INJECTION
VII. MODE OF T	TRANSPORTATION	\(\text{(transporters only -}	enter "X" in the	appropriate	box(es))
☐ A. AIR	B. RAIL	GC. HIGHWAY	D. WATER	E. OTHE	R (specify):
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		ate whether this is your in your Installation's EPA I.			zardous waste activity or a subsequent notification. pelow.
					C. INSTALLATION'S EPA I.D. NO.
🔀 A. FIRST	NOTIFICATION	B. SUBSEQUE	NT NOTIFICATION	N (complete iter	m C)
	ON OF HAZARDOU				
Estimana an to the cou	erse of this form and p	rovide the requested info	rmation.		

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)								
A. HAZARDOUS WASTES FROM NON—SPECIFIC SOURCES. Enter the four—digit number from 40 CFR Part 261.31 for each listed hazardous waste from non—specific sources your installation handles. Use additional sheets if necessary.								
1 23 - 26	2 2 23 - 26 2	3 . 26	23 - 26	23 - 26	23 - 26			
7	23 - 26 8	9	10	23 - 26	12 D M T T A C T T			
B. HAZARDOUS WASTES FRO specific industrial sources your				rt 261.32 for each list	ed hazardous waste from			
13	14	15	16	17	18			
19	20	21	22	23	24			
25 - 26	26	27	28	29	30			
C. COMMERCIAL CHEMICAL P stance your installation handle	RODUCT HAZARDOUS which may be a hazardo	WASTES. Enter the four waste. Use addition	23 - 26 our—digit number from all sheets if necessary.	40 CFR Part 261.33	for each chemical sub-			
31 23 - 26 37	32 23 · 26 38	33	34 23 - 26 40	35 23 - 26	36			
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23 - 26	23 - 26 , 2	26	23 - 26	23 - 26	23 - 26			
D. LISTED INFECTIOUS WAST hospitals, medical and research	ES. Enter the four-digit laboratories your installa	number from 40 CFR I tion handles. Use addi	Part 261.34 for each list tional sheets if necessar	ted hazardous waste fr y.	om hospitals, veterinary			
49	23 - 26 2	51	52	53	23 - 26			
E. CHARACTERISTICS OF NON hazardous wastes your installar	N-LISTED HAZARDOUS tion handles. (See 40 CF)	S WASTES. Mark "X" R Parts 261.21 — 261.2	in the boxes correspond 4.)	ding to the characteris	tics of non-listed			
1. IGNITABLE	□2. cc (D002)	RROSIVE	3. REACTIVE		4. TOXIC			
X. CERTIFICATION I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.								
SIGNATURE	·		L TITLE (type or print)	1	DATE SIGNED			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS PHILADELPHIA, PENNSYLVANIA 19106

February 6, 1981 Certified Mail Return Receipt Requested

Mr. Charles W. Schwarz Alex C. Fergusson Company Spring Mill Drive Frazer, PA 19355

Re: Nonregulated Facility

Facility Name: Alex C. Fergusson Company

Facility Location: Spring Mill Drive Frazer, PA 19355

Dear Mr. Schwarz:

The Environmental Protection Agency (EPA) has received Part A of a permit application pursuant to Section 3005 of the Resource Conservation and Recovery Act for the facility referenced above. The application does not demonstrate that the facility is one which is required to have a Federal permit under Section 3005 of the Act. Accordingly, the Agency is returning the application.

If you have any questions, please contact Joan Henry on 215/597-8751 or Bill Walsh on 215/597-1230.

Sincerely yours,

Shirley D. Bulkin Chief, RCRA Administrative Support Section Permit Enforcement Branch Enforcement Division

Enclosure

	PHONE CALL DISCUSSION	FIELD TRIP CONFERENCE
RECORD OF COMMUNICATION	OTHER (SPECIFY)	
	(Record of item	checked above)
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Installation's Pana: Olex C. Fergusson Company

ACTUAL CONTRACTOR OF THE

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D.	(1) NON-NOTIFIER					
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E.	(1) FORM 1, MAIN & SIGNATURE					
	(2) FORM 3, IX B SIGNATURE					
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В.	NONREGULATED					
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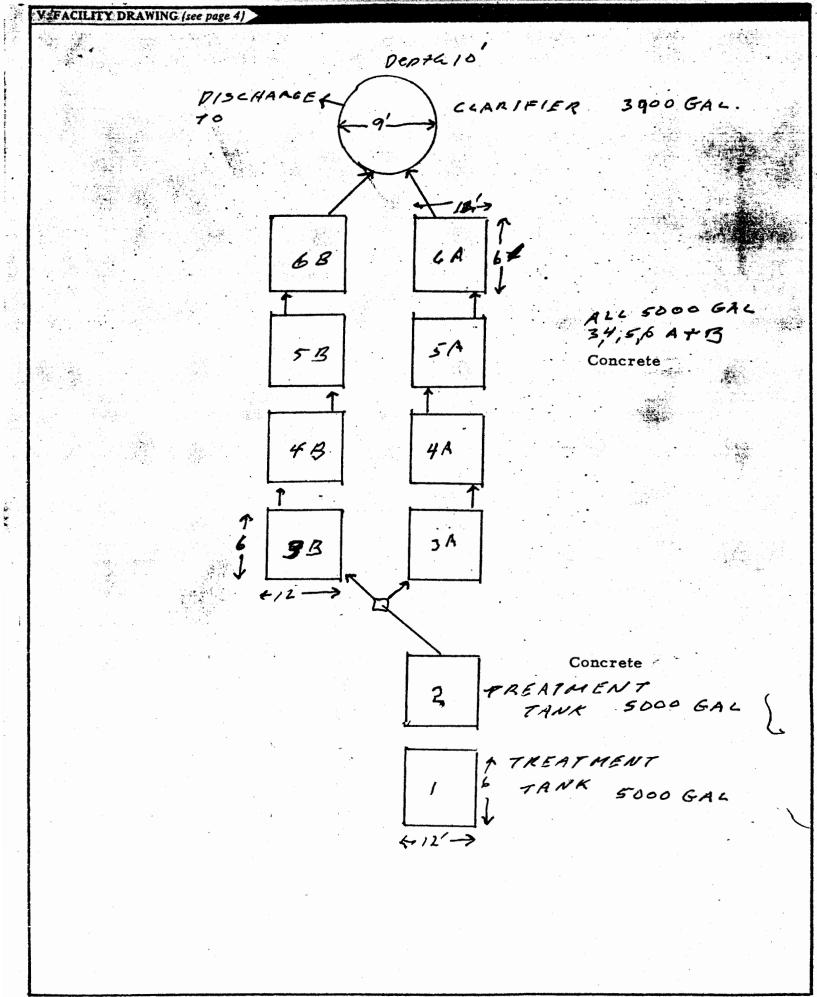
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VI. PHOTOGRAPHS	paga o a sc	are drawing of the facility (see instructions	Tor more detairy.	
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VIII. FACILITY OWNER	billion in			**
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Alex. C. Fergusson Company Alex. C. Fergusson Company Spring Mill Drive IX. OWNER CERTIFICATION I certify under penalty of law that I have personally documents, and that based on my inquiry of those in submitted information is true, accurate, and complet including the possibility of fine and imprisonment. A. NAME (print or type) A. Carter Fergusson X. OPERATOR CERTIFICATION I certify under penalty of law that I have personally documents, and that based on my inquiry of those in submitted information is true, accurate, and complete including the possibility of fine and imprisonment. A. NAME (print or type)	examined and ividuals te. I am a a a a a a a a a a a a a a a a a	A. CITY OR TOWN Frazer, PA If and am familiar with the information immediately responsible for obtaining ware that there are significant penaltic and am familiar with the information immediately responsible for obtaining ware that there are significant penaltic ware that there are significant penaltic.	2. PHO 2 5 35 56 - 35 5. ST. P A 40 41 42 In submitted in this ag the information, es for submitting fa C. DATE S November 1 Submitted in this ag the information, es for submitted in this ag the information, es for submitting fa	NE NO. (area code & no.) -6 47 -3 3 -33 6. ZIP CODE 1 9 3 5 5 12 - 31 and all attached I believe that the alse information, and all attached I believe that the alse information,
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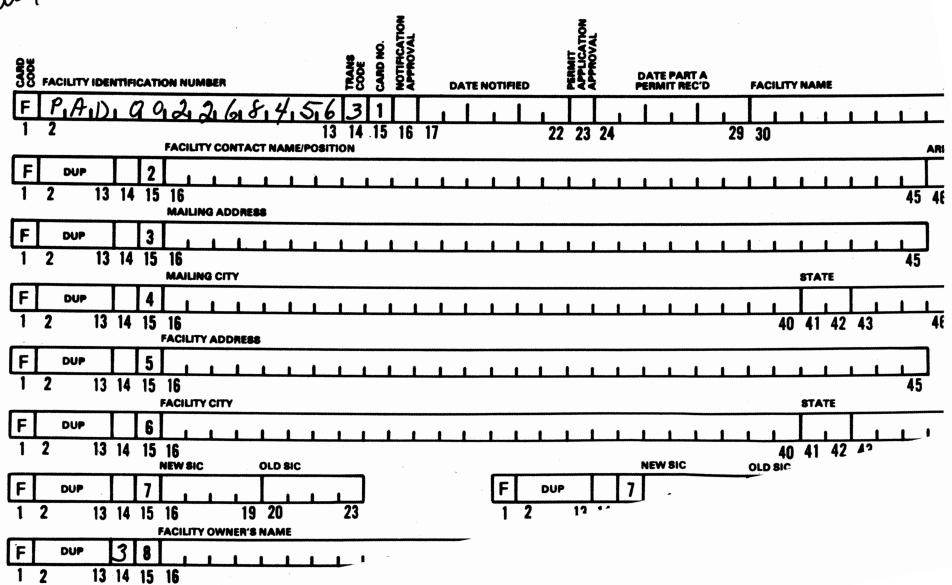


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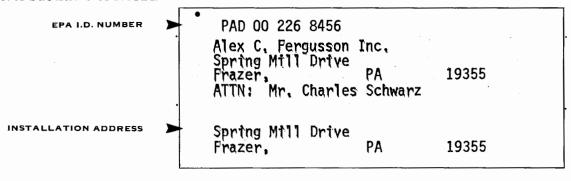
ENVIRONMENTA SEPA HAZARDOUS WASTE DA **FACILITY INVENTO**





ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.



EPA Form 8700-12B (4-80)